

ORDNANCE SYSTEMS INC.
Radford Army Ammunition Plant
4050 Pepper's Ferry Road
Radford Virginia 24141

March 5, 2015

Leslie Romanchik
Hazardous Waste Program Manager
Virginia Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219

**Subject: RFAAP Incinerator Permit Application NOD Response
Radford Army Ammunition Plant, Radford, Virginia
EPA ID#: VA1210020730**

Dear Ms. Romanchik:

Attached, please find our responses to the first notice of deficiency issued by the Virginia Department of Environmental Quality (DEQ) October 7, 2014, for the Incinerator Resource Conservation and Recovery Act (RCRA) renewal application submitted in April 2012. As you are aware, there remain a few issues that were raised in the NOD which we are still discussing with DEQ at this time or which DEQ agreed to reassess prior to our response. These include:

- Determining the level of risk reassessment that is required. As of our last meeting, DEQ was evaluating whether additional stack testing will be required. Once this is finalized, RFAAP will prepare a risk assessment protocol for DEQ's review.
- Determining the applicability of the military munitions rule (MMR) to those materials handled at the New River Unit (NRU) and transferred to and subsequently processed at the RFAAP. DEQ is evaluating the MMR internally and RFAAP is reviewing the rule with Joint Munitions Command (JMC) and legal counsel. A conference call will be scheduled with all parties as soon as these reviews are completed.
- Reassessing whether the information specified in the Contingency Plan regarding emergency response for hazardous waste emergencies adequately satisfies RCRA requirements or whether further additions are required to supplement the non-RCRA based emergency response plans that were removed.
- Reassessing the Closure Plan and providing more detail on specific deficiencies in the closure procedures and specifications that DEQ noted generally during their review. Once these additional details are required, RFAAP will respond accordingly.
- Reassessing the Security Plan and determining if the information provided from other RFAAP RCRA permits satisfies the RCRA requirements for this unit or whether further information is required.
- Reassessing the Flood Plan and providing more detail on specific deficiencies in the flood response procedures that DEQ noted generally during their review. Once these additional details are required, RFAAP will respond accordingly.

Absent those very critical items, we have worked with DEQ over the past few months to resolve each of the items raised in the NOD. The attached response provides the current status on each of these items and outlines the path that will be taken to rectify those items that require attention by RFAAP. Once all of the outstanding items noted herein are resolved, we will work with DEQ to determine a reasonable schedule for submittal of the modified application components. Per our discussions in December 2014 and January 2015, we understand that this schedule will reflect a tiered submittal of information, depending on the complexity of the adjustment that is required.

If you have any questions or concerns regarding our responses or the outstanding items we have identified, please contact Mr. Matt Alberts at 540/639-8722 (matt.alberts@baesystems.com).

Sincerely,


Jay Stewart
Environmental Manager
BAE Systems, Ordnance Systems Inc.

Enclosure

c: Russ McAvoy, VDEQ-CO

Coordination: 
J. McKenna

bc: J. Stewart, BAE Staff
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